

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
v.	)	No. 4:23-CR-505 AGF PLC
	)	
MARCELLIS BLACKWELL,	)	
	)	
Defendant.	)	

**UNITED STATES OF AMERICA’S NOTICE OF INTENT  
NOT TO CALL WITNESSES AT SUPPRESSION HEARING**

The United States of America, by and through its Attorneys, Matthew T. Drake, Acting United States Attorney for the Eastern District of Missouri, and Christine H. Krug, Assistant United States Attorney for said District and hereby provides notice that the United States does not intend to call witnesses at the hearing regarding the Defendant’s motion to suppress evidence. While the Defendant has made a *Franks* allegation, he has not met the substantial preliminary showing necessary to be granted a *Franks* hearing. Therefore, “only that information which is found within the four corners of the affidavit may be considered in determining the existence of probable cause.” *United States v. Leichtling*, 684 F.2d 553, 555 (8th Cir. 1982). The United States intends to admit a copy of the three search warrants, applications for the search warrants, and affidavits in support of each search warrant pursuant to Fed.R.Evid. 902(2).

Respectfully submitted,

MATTHEW T. DRAKE  
Acting United States Attorney

/s/ Christine H. Krug  
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Assistant United States Attorney  
111 South 10th Street, Room 20.333  
St. Louis, Missouri 63102  
(314) 539-2200

**CERTIFICATE OF SERVICE**

I hereby certify that on July 2, 2025, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system all counsel of record.

/s/ Christine H. Krug  
CHRISTINE H. KRUG, #42586MO  
ASSISTANT UNITED STATES ATTORNEY